

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND**

RYAN DILLON-CAPPS

*Plaintiff,*

vs.

OHANA GROWTH PARTNERS, LLC *et al*

*Defendants*

Civil Action

No. \_\_\_\_\_

Hon. \_\_\_\_\_

**PREFATORY APPENDIX B: CAUSE OF ACTION TABLE**

Federal Trade Commission Act (FTC Act)	15 U.S.C. § 45
Mail Fraud Statute	18 U.S.C. § 1341
Wire Fraud Statute	18 U.S.C. § 1343
Racketeer Influenced and Corrupt Organizations Act (RICO)	18 U.S.C. §§ 1961–1968
Code of Federal Regulations (FMLA Rules)	29 C.F.R. Part 825
Employee Retirement Income Security Act (ERISA)	29 U.S.C. § 1001 et seq
Section 504 of the Rehabilitation Act	29 U.S.C. § 794
Norris-LaGuardia Act (NGA)	29 U.S.C. §§ 101–115
Consolidated Omnibus Budget Reconciliation Act (COBRA)	29 U.S.C. §§ 1161–1169
Fair Labor Standards Act (FLSA)	29 U.S.C. §§ 201–219
Family and Medical Leave Act (FMLA)	29 U.S.C. §§ 2601–2654
Federal False Claims Act (FCA)	31 U.S.C. §§ 3729–3733
Americans with Disabilities Act Title I	42 U.S.C. § 12112 et seq
Health Insurance Portability and Accountability Act (HIPAA)	42 U.S.C. § 1320d et seq
Civil Rights Act	42 U.S.C. § 1983
Conspiracy to Interfere with Civil Rights	42 U.S.C. § 1985
Failure to Prevent Conspiracy	42 U.S.C. § 1986
Americans with Disabilities Act Title II	42 U.S.C. §§ 12131–12165
California Unfair Competition Law (UCL)	Cal. Bus. & Prof. Code § 17200
California Consumers Legal Remedies Act (CLRA)	Cal. Civ. Code §§ 1750–1784
California False Claims Act	Cal. Gov. Code § 12650 et seq
California Whistleblower Protection Act	Cal. Lab. Code § 1102.5
District of Columbia False Claims Act	D.C. Code § 2-223.02
D.C. Consumer Protection Procedures Act (CPPA)	D.C. Code § 28-3901 et seq
Florida Whistleblower’s Act	Fla. Stat. § 112.3187
Florida Deceptive and Unfair Trade Practices Act (FDUTPA)	Fla. Stat. § 501.201
Florida False Claims Act	Fla. Stat. § 68.081
Maryland Health Insurance Continuation	Md. Code Ann., Ins. § 15-408
Maryland Consumer Protection Act (MCPA)	Md. Code, Com. Law §§ 13-101–13-501
Maryland Criminal Law	Md. Code, Crim. Law §§ 9-101, 8-606, 8-607, 3-502, 7-104
Maryland Public Information Act (PIA)	Md. Code, Gen. Prov. §§ 4-101–4-601
Maryland False Claims Act (MFCA)	Md. Code, Gen. Prov. §§ 8-101–8-113
Maryland Flexible Leave Act (MFLA)	Md. Code, Lab. & Empl. § 3-802
Maryland Wage Payment and Collection Law (MWACL)	Md. Code, Lab. & Empl. §§ 3-501–3-509
Maryland Tort Claims Act (MTCA)	Md. Code, State Gov’t § 12-101 et seq.
Maryland Anti-Discrimination Law	Md. Code, State Gov’t § 20-304
Maryland Fair Employment Practices Act (MFEPA)	Md. Code, State Gov’t § 20-606
Maryland Declaration of Rights	Md. Const., Articles 19, 24, 46
Maryland Code of Judicial Conduct	Md. Rule 18-101.1 et seq

Maryland Rules of Civil Procedure	Md. Rules 1-201, 1-322.1
Tennessee Medicaid False Claims Act	Tenn. Code Ann. § 4-18-101
Tennessee Consumer Protection Act (TCPA)	Tenn. Code Ann. § 47-18-101
Tennessee Public Protection Act (Whistleblower Protection)	Tenn. Code Ann. § 50-1-304
First Amendment	U.S. Const. amend. I
Ninth Amendment	U.S. Const. amend. IX
Fifth Amendment	U.S. Const. amend. V
Sixth Amendment	U.S. Const. amend. VI
Eighth Amendment	U.S. Const. amend. VIII
Thirteenth Amendment	U.S. Const. amend. XIII
Fourteenth Amendment	U.S. Const. amend. XIV
Washington Consumer Protection Act (CPA)	Wash. Rev. Code § 19.86.010
Washington State Whistleblower Protection Act	Wash. Rev. Code § 42.41.040
Washington State Medicaid False Claims Act	Wash. Rev. Code § 74.66.020

RESPECTFULLY SUBMITTED

December 25, 2024

/s/ Ryan Dillon-Capps

**Ryan Dillon-Capps**

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